

ROBBINS
LITIGATION AND REGULATORY LAW

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January 7, 2022

VIA COURIER DELIVERY

Honorable Amy Totenberg
United States District Judge
United States District Court for the Northern District of Georgia
2388 Richard B. Russell Federal Building and U.S. Courthouse
75 Ted Turner Drive, S.W.
Atlanta, Georgia 30303

Re: Production of reports issued by Fortalice for the Court's in camera review,
Curling v. Raffensperger, 1:17-CV-2989-AT

Dear Judge Totenberg:

On December 10, 2021, the Court issued an Order directing the State Defendants to produce, on a sealed basis, reports issued by Fortalice which were requested by Curling Plaintiffs via subpoena to Fortalice and are reflected in Fortalice's privilege log. As per the Court's Order, State Defendants hereby produce these documents on a sealed basis, and for the Court's in camera review. As directed, State Defendants are producing, for in camera review, any final reports contained therein or, in the event a final report does not exist, the latest draft form of the reports. Additionally, State Defendants are including herein a spreadsheet referencing reports which Fortalice has already produced to Plaintiffs pursuant to the subpoena.

Sincerely,
Vincent R. Russo
Vincent R. Russo

VRR/db

cc: CM/ECF e-filing